



December 8, 2011

Via Electronic Filing

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street SW Washington, DC 20554

Re: Ex parte Notice: CG Docket 10-51; PS Docket 09-14

Dear Ms. Dortch:

On December 7, 2011 Mr. Mark Seeger, Senior Director of Business Development for Communication Service for the Deaf, Inc. ("CSD") met with Karen Peltz Strauss, Deputy Chief, Consumer and Governmental Affairs Bureau and Mr. Gregory Hlibok, Chief, Disability rights Office.

CSD discussed some of the difficulties associated with the call routing of emergency calls to public safety answering points ("PSAPs") in the context of SMS and Video users, such as the deaf and hard-of-hearing community. The potential for the use of an intelligent network solution to provide direct routing to IP enabled or NextGen PSAPs. The related issue of the use of native 9-1-1 trunks (trunks directly into PSAPs) versus the use of 10-digit numbers for access was also briefly discussed.

CSD also discussed the need to allow the assignment of 10-digit numbers for services such as deaf-to-deaf call centers used for community outreach and awareness programs. CSD will provide a separate filing related to this issue in the near future.

CSD also addressed concerns related to "Connect to Compete" plans which provide low-cost (\$10) monthly access to broadband services for low income individuals. CSD applauds the companies offering these plans and support their efforts. However, in many cases the bandwidth made available in these plans is capped or metered. While this is not an issue for services such as email or basic access to web pages, for the deaf and hard-of-hearing who rely on video for their primary mode of communication these lower speeds do not support the fluidity of motion or continuity necessary to adequately present sign language over video. Typically this problem is more prevalent for the "up-load" portion of the service than the "download" portion.

Respectfully Submitted,

Mark Ekse

Hagen, Wilka & Archer, LLP

Cc: Karen Peltz Stauss

Gregory Hlibok